Case 1:18-md-02865-LAK Document 116 Filed 05/06/19 Page 1 of 4

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

## SKAT TAX REFUND SCHEME LITIGATION

This document relates to: 1:19-cv-01867-LAK. 1:19-cv-01868-LAK, 1:19-cv-01869-LAK, 1:19cv-01895-LAK, 1:19-cv-01896-LAK, 1:19-cv-01898-LAK, 1:19-cv-01904-LAK, 1:19-cv-01865-LAK, 1:19-cv-01866-LAK, 1:19-cv-01871-LAK, 1:19-cv-01873-LAK, 1:19-cv-01894-LAK, 1:19cv-01930-LAK, 1:19-cv-01893-LAK, 1:19-cv-01906, 1:19-cv-01911, 1:19-cv-01924, 1:19-cv-01781-LAK, 1:19-cv-01785-LAK, 1:19-cv-01791-LAK, 1:19-cv-01783-LAK, 1:19-cv-01788-LAK, 1:19-cv-01794-LAK, 1:19-cv-01798-LAK, 1:19cv-01918-LAK, 1:19-cv-01922-LAK, 1:19-cv-01926-LAK, 1:19-cv-01928-LAK, 1:19-cv-01929-LAK, 1:19-cv-01931-LAK, 1:19-cv-01800-LAK, 1:19-cv-01803-LAK, 1:19-cv-01809-LAK, 1:19cv-01812-LAK, 1:19-cv-01818-LAK, 1:19-cv-01792-LAK, 1:19-cv-01806-LAK, 1:19-cv-01808-LAK, 1:19-cv-01815-LAK, 1:19-cv-01870-LAK, 1:19-cv-01801-LAK, 1:19-cv-01810-LAK, 1:19cv-01813-LAK

Master Docket 18-md-02865 (LAK) ECF Case

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: MAY - 8 2019

## STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO THE COMPLAINTS

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the parties that the current May 13, 2019 deadline for Defendants in the cases enumerated in the caption to answer or file a motion in response to the Complaints is hereby extended thirty (30) days up to and including June 12, 2019.

Case 1:18-md-02865-LAK Document 116 Filed 05/06/19 Page 2 of 4

No provision of this Stipulation and Order shall be construed as a waiver of, and Defendants expressly reserve, any and all defenses.

This is the Defendants' first request for an extension of time to answer or otherwise respond to the Complaints.

Dated: May 3, 2019

New York, New York

Case 1:18-md-02865-LAK Document 116 Filed 05/06/19 Page 3 of 4

/s/ Alan E. Schoenfeld (e-signed with consent) ALAN E. SCHOENFELD WILMER CUTLER PICKERING HALE AND DORR LLP 7 World Trade Center 250 Greenwich Street New York, NY 10007 (212) 230-8800 alan.schoenfeld@wilmerhale.com Attorney for Defendants Richard Markowitz, Jocelyn Markowitz, Avanix Management LLC Roth 401(K) Plan, Batavia Capital Pension Plan, Calypso Investments Pension Plan, Cavus Systems LLC Roth 401(K) Plan, Hadron Industries LLC Roth 401(K) Plan, RJM Capital Pension Plan, and Routt Capital Pension Plan

/S/ Sarah L. Cave (e-signed with consent)
SARAH L. CAVE
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, NY 10004
(212) 837-6000
sarah.cave@hugheshubbard.com
Attorney for Plaintiff Skatteforvaltningen

(e-signed with consent)
SHARON L. MCCARTHY
KOSTELANETZ & FINK LLP
7 World Trade Center, 34<sup>th</sup> Fl.
New York, NY 10007
(212) 840-6866
smccarthy@kflaw.com
Attorney for Defendants John van
Merkensteijn, III, Elizabeth van Merkensteijn,
Azalea Pension Plan, Basalt Ventures LLC
Roth 401(K) Plan, Bernina Pension Plan,
Omineca Pension Plan, Starfish Capital

Management LLC Roth 401(K) Plan, Tarvos Pension Plan, and Voojo Productions LLC

/s/ Sharon L. McCarthy

Roth 401(K) Plan

/S/ Michelle A. Rice
MICHELLE A. RICE
KAPLAN RICE LLP
142 West 57<sup>th</sup> Street
Suite 4A
New York, NY 10019
(212) 333-0227
mrice@kaplanrice.com
Attorney for Defendants Joseph Herman,
David Zelman, Edwin Miller, Ronald Altbach,

Case 1:18-md-02865-LAK Document 116 Filed 05/06/19 Page 4 of 4

Perry Lerner, Robin Jones, Albedo Management LLC Roth 401(K) Plan, Ballast Ventures LLC Roth 401(K) Plan, Fairlie Investments LLC Roth 401(K) Plan, Bareroot Capital Investments LLC Roth 401(K) Plan, Battu Holdings LLC Roth 401K Plan, Cantata Industries LLC Roth 401(K) Plan, Dicot Technologies LLC Roth 401(K) Plan, Vanderlee Technologies Pension Plan, Cedar Hill Capital Investments LLC Roth 401(K) Plan, Fulcrum Productions LLC Roth 401(K) Plan, Green Scale Management LLC Roth 401(K) Plan, Keystone Technologies LLC Roth 401(K) Plan, Tumba Systems LLC Roth 401(K) Plan, Crucible Ventures LLC Roth 401(K) Plan, Limelight Global Productions LLC Roth 401(K) Plan, Plumrose Industries LLC Roth 401K Plan, Roadcraft Technologies LLC Roth 401(K) Plan, True Wind Investments LLC Roth 401(K) Plan, Eclouge Industry LLC Roth 401(K) Plan, First Ascent Worldwide LLC Roth 401(K) Plan, Loggerhead Services LLC Roth 401(K) Plan, PAB Facilities Global LLC Roth 401(K) Plan, Trailing Edge Productions LLC Roth 401(K) Plan, Monomer Industries LLC Roth 401(K) Plan, Pinax Holdings LLC Roth 401(K) Plan, and Sternway Logistics LLC Roth 401(K) Plan

SO ORDERED:

Hon Lewis A. Kaplan

United States District Judge